

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

PARKER TIRRELL and IRIS TURMELLE,

Plaintiffs,

v.

FRANK EDELBLUT, in his official capacity as
Commission of the New Hampshire Department
of Education, *et al.*,

Defendants.

Case No. 1:24-cv-00251-LM-TSM

**DEFENDANTS FRANK EDELBLUT, ANDREW CLINE, KATE CASSADY,
ANN LANE, PHILIP NAZZARO, RAJESH NAIR, JAMES FRICCHIONE,
AND JAMES LABOE’S ASSENTED-TO MOTION TO EXTEND TIME TO FILE A
RESPONSIVE PLEADING TO PLAINTIFFS’ FIRST AMENDED COMPLAINT**

NOW COME Defendants Frank Edelblut, Andrew Cline, Kate Cassady, Ann Lane, Philip Nazzaro, Rajesh Nair, James Fricchione, and James Laboe (collectively, the “State Defendants”), by and through counsel, the Office of the Attorney General, and move pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure to extend their deadline to file a responsive pleading to Plaintiffs’ First Amended Complaint (ECF No. 78), and state as follows:

1. On November 8, 2024, Plaintiffs filed their First Amended Complaint pursuant to Rule 15 of the Federal Rules of Civil Procedure. ECF No. 78.
2. State Defendants’ responsive pleading is due on or before November 22, 2024. Fed. R. Civ. P. 15(a)(3).
3. To adequately address the amendments, State Defendants require more time to respond.
4. Thus, State Defendants respectfully request that the Court extend Defendants’ deadline to file their responsive pleading to December 6, 2024.

5. An extension to December 6, 2024 will not cause the continuance of any hearing, conference, or trial.

6. All parties have assented to this Motion.

WHEREFORE, State Defendants respectfully request that this Honorable Court:

- A. Grant Defendants' Motion to Extend Time;
- B. Allow State Defendants to file their responsive pleading on or before December 6, 2024; and
- C. Grant such further relief as is just and equitable.

Respectfully submitted,

DEFENDANTS FRANK EDELBLUT,
ANDREW CLINE, KATE CASSADY, ANN
LANE, PHILIP NAZZARO, RAJESH NAIR,
JAMES FRICCHIONE, and JAMES LABOE

By their attorneys,

JOHN M. FORMELLA
ATTORNEY GENERAL

Date: November 8, 2024

/s/ Michael P. DeGrandis
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all parties of record through the Court's e-filing system.

/s/ Michael P. DeGrandis
Michael P. DeGrandis